

### **Remarks/Arguments**

Claims 1, 6, 37 and 40 have been amended. Claims 63 and 64 have been added. Please charge any claim or other fees for entry of this Amendment to our Deposit Account No. 03-3415.

Applicants note that the Examiner has correctly recognized that applicants made an inadvertent error in the identifier for claim 62 in applicants' prior response. The Examiner has correctly treated claim 62 as a new claim in such prior response. Accordingly, applicants have identified claim 62 herein as "Previously Presented".

The Examiner has rejected applicants' claims 1, 3, 6, 8, 9, 12-18, 20 and 22-36 under 35 USC § 103(a) as unpatentable over the Carr (U. S. Pre-Grant Publication No. 2001/0040349) publication taken with the Namikawa, et al. (US 6,070,911) patent. The Examiner has further rejected applicants' claims 19, 21, 37, 40, 42-51, 52, 53, 54, 56, 57 and 58-62 under 35 USC § 103(a) based on the latter two references taken with one or more of the Schlicht (US 5,967,566) patent, the Pabla, et al. (US 2004/0137259) patent application publication, the Energy Partners reference and the Guthrie, et al. (US 4,786,086) patent. With respect to applicants' claims, as amended, these rejections are respectfully traversed.

Applicants' independent claims 1 and 37 have been amended to better define applicants' invention. More particularly, amended claim 1 recites a "connection assembly for connecting first and second components so as to promote electrical isolation therebetween comprising first and second members adapted to be connected to said first and second components and a dielectric member situated between said first and second members, wherein each of said first and second members includes a through opening and

said dielectric member is a disk-shaped member having opposing first and second flat surfaces which extend to a through opening in said disk-shaped member, said through openings of said first and second members and said dielectric member being such as to allow passage through the through opening of one of the first and second members, through the through opening of the dielectric member, and then through the through opening of the other of the first and second members, and wherein the through opening of said dielectric member is smaller than the through openings of said first and second members.”

Additionally amended claim 1 further recites “wherein: each of said first and second members has first and second opposing surfaces, an outer surface connecting the outer peripheries of said first and second opposing surfaces, and the through opening of each of said first and second members extends between the first and second surfaces of that member; said through opening of said dielectric member extends between the first and second surfaces of the dielectric member; and the first surface of said dielectric member faces the first surface of one of said first and second members and the second surface of said dielectric member faces the first surface of the other of said first and second members; the first surface of said dielectric member outward of the through opening of the dielectric member abuts a part of the first surface of said one of said first and second members and the second surface of the dielectric member outward of the through opening of the dielectric member abuts a part of the first surface of the other of said first and second members; said parts of said first surfaces of said first and second members are coated with a dielectric coating.”

Finally, claim 1 has been further amended to recite “said coating on said parts of said first surfaces of said first and second members has a surface roughness of equal to or less than approximately 80  $\mu$ in.” This feature is supported by the description in applicants’

specification at page 10, lines 16-18 and is shown in FIG. 4 of the drawings. Independent claim 37 has been similarly amended. Such a construction is not taught or suggested by the cited art of record.

The Examiner has argued as follows with respect to surface coating and the polishing feature in applicants' claims:

“Applicants state that the Namikawa reference does not teach that any and all parts may be coated, that the material is polished . . . . This is not found persuasive because applicants have not recited anywhere in any of the claims the degree to which any and all of the part will be coated . . . . It would also be within the level of skill of a person having ordinary skill in the art that if say 5 parts of 6 total parts need to be coated, that all 6 parts be coated . It would also stand to reason that if for example spray coating were used that overspray would occur and every part would have some sort of overspray, which is coating in and of itself. Also, if dip coating were then used everything would be coated. . . . As to polishing, the Examiner reads said limitation as a product-by process limitation. Further applicants again do not recite any sort of degree as to the level of polishing. If applicants can show that they have unexpected results for this polishing then applicants are encouraged to do so through an affidavit. The Examiner also notes that by assembling parts that have been coated a certain degree of polishing can be expected just by the parts rubbing up against one another, also just by the person assembling the connection assembly will some sort of polishing occur just from handling the apparatus.”

Applicants' amended claims are believed to overcome the Examiner's above arguments. First, applicants believe that applicants claims do specify the parts being coated. In particular, the claims recite that the coating is on “said parts of said first surfaces of said first and second members.” These “said parts” of the first surfaces of the first and second members are recited as the parts of these members abutting the first and second surfaces of the dielectric member outward of the through opening. With reference to FIG 1, these are the surfaces 121a of the raised faces 121 of the members 101 abutting the opposing surfaces of the dielectric member outward of the opening 124.

As applicants have previously argued, the Namikawa, et al. patent discloses that only limited parts of the assembly are coated with an insulation a material. Specifically, the Namikawa, et al. patent describes an insulation 1 between the seal ring and the hubs which is fabricated using a “coating method adapted to form a layer of an insulating resin on the seal ring.” The insulating layer is applied to the seal ring surfaces contacting the front or first surfaces of the hubs as is described at length at column 2, line 57 through column 3, line 21 of the patent. The Namikawa, et al. patent also describes applying an insulation between the hubs and a clamp which engages the back or second surfaces of the hubs by “applying a coat of insulating resin material (similar to the insulation 1) to the clamp and the hubs or by interposing lamination of metal and resin material shown in FIG. 4 between the clamp and the hubs.” (Column 3, lines 35-48).

Thus, the Namikawa, et al. patent clearly does not teach or suggest applying an insulation coating to the surfaces of the hubs in contact the sealing ring. In fact, Namikawa, et al. patent teaches applying coating to the seal ring surfaces in contact with the hub surfaces. While the Examiner has argued that a skilled artisan can apply a coating to any and all surfaces, it would not seem reasonable for a skilled artisan to apply an insulation coating to the hub surfaces in contact with the sealing ring in the Namikawa, et al. patent, since insulation is not required on these surfaces due to the insulation coating on the seal ring. Also, the argument that there might be overspray onto these surfaces when coating the clamp contact surfaces S also seems not to be supported by the patent, since the surfaces S themselves appear to shield the hub surfaces in contact with the seal ring from any overspray. Finally, the Examiner has argued that the hubs in the Namikawa, et al patent might be dip coated, so that all parts would be coated. However, there is no mention of this in the patent

and since only the limited surface areas of the hubs are to be coated, the use of dip coating would appear unnecessary.

In any case, in addition to specifically reciting the particular surfaces being coated in applicants' claims, applicants have now further specified the nature of the polishing of the coating. Specifically, applicants have defined this polishing in terms of the surface roughness of the coating, so that the recitation defines a structural feature of the connection assembly and can no longer be viewed as a product-by-process limitation. Additionally, the claims now specify that the roughness be equal to or less than about approximately 80  $\mu$ in. Accordingly, the Examiner's further argument that the degree of polishing is not specified or that some degree of polishing occurs by the parts rubbing or just being handled has also been overcome, since the claimed degree of polishing cannot simply result by handling or rubbing of the parts.

Finally, there is nothing taught or suggested in the Namikawa, et al. patent as to polishing any of the coatings on the hubs or, for that matter, the coating on the sealing ring, let alone that the coatings have a surface roughness equal to or less than about approximately 80  $\mu$ in. Likewise, the Carr patent has no teaching or suggestion of this, nor do any of the other cited references, i.e., the Schlicht patent, the Pabla, et al. patent application publication, the Energy Partners reference and the Guthrie, et al. patent.

Thus, applicants amended claims 1 and 37, and their respective dependent claims, in reciting "said parts of said first surfaces of said first and second members are coated with a dielectric coating; said coating on said parts of said first surfaces of said first and second members has a surface roughness of equal to or less than approximately 80  $\mu$ in" patentably distinguish over the combination of the cited references.

Applicants further note that the features of the amended claims are believed to further patentably distinguish these claims over the references. In particular, applicants note, in this regard, that claims 6 and 40, as amended, now recite features that further patentably distinguish these claims over the references. Specifically, these claims each recite as follows: each of said one and said other of said first and second members has one or more second through openings extending from the first surface to the second surface of that member; said dielectric member includes one or more second through openings extending from the first surface to the second surface of the dielectric member; each of the second through openings in said one of said first and second members has a corresponding second through opening in other of said first and second members and the corresponding through openings in said one and said other of said first and second members align with a second through opening in said dielectric member; and said one or more second through openings in said one and said other of said first and second members and said one or more through openings in said dielectric member being adapted receive a fastening assembly for fastening said first and second members and said dielectric member together; the one or more second through openings in said one of said first and second members are situated outward of the part of the first surface of said one of the first and second members abutted by said first surface of said dielectric member and the one or more second through openings in said other of said first and second members are situated outward of the part of the first surface of said other of said first and second members abutted by the second surface of said dielectric member; the first and second surfaces of each of the one and other of said first and second members having parts extending outward of the one or more second through openings in that member to the peripheries of the first and second surfaces of that member connected by the outer surface of that member; and



the dielectric member has a third surface connecting the outer peripheries of the first and second surfaces of the dielectric member, the first and second surfaces of the dielectric member having parts extending outward of the one or more through openings of the dielectric member and which extend to the third surface of the dielectric member and are of an extent that the third surface of the dielectric member extends outward of the outer surface of the one of the first and second members and outward of the outer surface of the other of the first and second members.

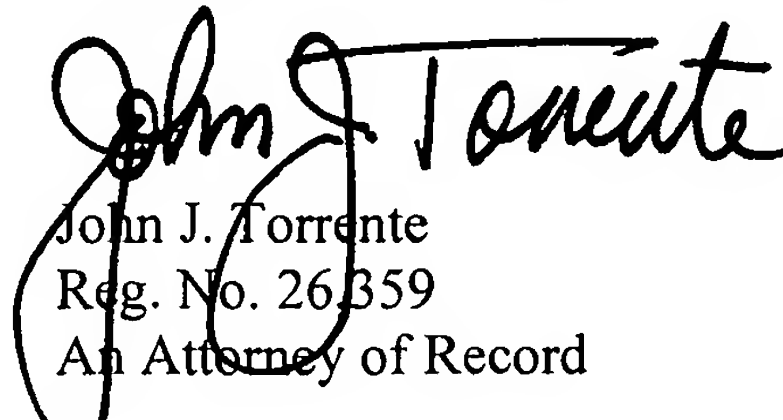
In the Carr publication, the only parts of the assembly not abutting the gasket that appear to have or be able to have aligned holes with aligned holes in the gasket for receiving bolts are the backing rings 8. (See, paragraph [0032] and FIG. 2A). However, it is evident that the outer periphery of gasket 10 does not extend beyond the outer surfaces of the backing rings 8 which are above the holes for receiving bolts in these rings. Amended claims 6 and 40 thus define features that patentably distinguish over the Carr publication and the other cited references.

In view of the above, it is submitted that applicants' claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

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